FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:	)	
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PUBLIC FORUM ON 711 ACCESS	)	CC Docket No. 92-105
TO TELECOMMUNICATIONS	)	
RELAY SERVICES	)	
	)	

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THE FEDERAL COMMUNICATIONS COMMISSION
COMMON CARRIER BUREAU

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Wednesday,
September 8, 1999

Federal Communications
Commission
The Portals Building
445 - 12th Street, S.W.
Washington, D.C. 20554

The meeting in the above-entitled matter was convened, pursuant to Notice, at 1:15 p.m.

BEFORE: HELENE SCHRIER NANKIN
Moderator

APPEARANCES:

FCC BOARD

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Commissioner, FCC

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CLAUDE STOUT
Executive Director
Telecommunications for the Deaf, Inc.

C O N T E N T S

P R O C E E D I N G S

(1:15 p.m.)

MS. NANKIN: My name is Helene Schrier Nankin. I'm a senior attorney in the Network Services Division of the FCC's Common Carrier Bureau. I have been working on telecommunications issues for over 10 years. For three of those years I have been working on telecommunications relay services issues.

I will be moderating today's public forum on 711 access to TRS. I am very excited about the excellent panel we have gathered here today, which consists of leaders of the industry, government, and the community who have dedicated themselves to making telecommunications accessible to individuals with hearing and speech disabilities.

I will first give a brief background on 711 access to TRS and then introduce the FCC staff that is seated around the table. There will be brief introductions and opening remarks, and then I will explain the format for the rest of the forum.

As I explained later I would like panelists to introduce themselves and state their affiliations at the start of their presentations. I will start with a brief background on 711 access to TRS. As many of you know, in 1997 the FCC reserved 711 for nationwide access to TRS. What this means is that once 711 is implemented nationwide,

relay users will be able to dial a three-digit code, 711, to reach a TRS center within a given state instead of having to dial the 1-800 or toll-free access numbers that they currently dial in each states.

Because users only need to dial and remember a three-digit code instead of dialing and remembering separate, toll-free-access numbers to TRS centers in each state, implementation of 711 access to TRS promises to make TRS more readily accessible nationwide. Not only will having a nationwide, three-digit code significantly reduce the number of digits that must be dialed when placing a relay call -- it will eliminate the problem of having to remember the appropriate local relay number when traveling to different states.

At the same time the FCC set aside 711 access to TRS, the FCC recognized that there were technical costs and competition issues that needed to be resolved before states could implement 711 TRS access. So in 1997 the FCC issued a further notice of approached rulemaking that sought comment on these issues.

The FCC received several comments and replies in response to the further notice. Many commenters stated that additional information was needed before implementation could be published. Since the time the further notice was issued, Maryland Relay has implemented 711 access to TRS,

and other states are moving toward implementation at varying paces.

We have called this forum of TRS users and user groups, state TRS administrators, carriers, and FCC staff to gather information on the remaining technical costs and competition issues that will help states implement 711 access to TRS.

We would also like to discuss states' experiences in providing 711 access to relay. We would like to identify the problems with implementing 711 access to TRS and to encourage information sharing among the states and carriers on solutions to such problems.

Our overall objective with respect to implementing nationwide 711 access to TRS is to implement 711 quickly, efficiently, and with minimum cost to carriers and states. Whatever format for 711 access to TRS is chosen, it must comply with Section 225 of the Act and the Commission's rules, which require carriers to provide functional equivalent relay service to that provided to voice users.

I would now like to introduce the FCC staff on the panel to all of you. To my immediate right is Yog Varma, who is deputy chief of the Common Carrier Bureau, and to my immediate left is Kurt Schroeder, acting chief of the Network Services Division. To his left is Jamal Mazrui, who is a technology specialist in the Network Systems Division,

who is also working with the Disabilities Issues Task Force. To his left is Dave Ward, senior attorney, who is also an engineer in the Network Systems Division.

And to my right, to actually Yog's right, is Pam Gregory, who is the deputy director of the of the Disabilities Issues Task Force, and to her right is Dale Hatfield, who is chief of the Office of Engineering and Technology. And then to Dale's right is Marty Liebman, who is senior engineer of the Wireless Bureau.

Now, I will turn the forum over to Kurt Schroeder, who as I said, is acting chief of the Network Systems Division.

MR. SCHROEDER: Thank you very much, Helene. My function right now is primarily going to be just to introduce Yog Varma, but before I do that, I would like to thank you all for coming here. It's fantastic to see such a significant turnout for this discussion, and I hope that we will all learn a great deal about the subjects we will be discussing.

I would also like to thank the many people on our staff who have helped put this event together. For a three-hour event like this we have had to put in a significant amount of time preparing for it, and Deborah Sabourin, who isn't up here with us, Dave Ward, Pat Forster, Marlin Jones, Allen McLeod, Allen Thomas, and Macell Mora,

with the exception of Dave, none of whom are sitting here with us, have put almost as much or probably more work into preparing for this than I have certainly, and I thank them for this work. Jenny Kennedy especially has done a great deal to help put this together, and I might also like to thank Pam Gregory, who is over to my right, who has given us invaluable advice about many of the details of manage this forum.

Now, I would like to introduce Yog Varma. Before joining the FCC a little over a year ago as deputy chief of the Common Carrier Bureau he was a senior official for several years, many years, at the New York Public Utilities Commission, so without any further adieu, I'll turn it over to him.

MR. VARMA: Thanks very much, Kurt. I appreciate it. Good afternoon, everyone. On behalf of the Commission, first of all, let me welcome you all to the forum this afternoon. The forum, as you know, is going to focus on 711 implementation issues. I think the issues that we address today are very crucial issues that affect the ability of the TRS users to communicate effectively with everyone else.

Let me take you back, though, for a moment to the Commission's 1997 report and order back in February of '97, about four and a half years ago. That report and order and the notice of proposed rulemaking had raised a number of

issues. It had raised a number of questions. For example, even the question of the technical feasibility of 711 had been raised at that point in time.

It appears to me that in the last three and a half years at least some of those questions have already been answered. For example, the technical feasibility of 711 has already been answered, in my view, because we have 711 deployment in the State of Maryland that was implemented, I believe, earlier this year. The State of Hawaii also has been able to deploy 711. In many parts of Canada 711 has similarly been deployed.

I also gather that the Pennsylvania Commission has been working on a plan and is inviting public comments on the plan before implementation of 711 in Pennsylvania. The State of New Jersey is probably not far behind.

I hope that with the experience in the State of Maryland, Hawaii, Canada, Pennsylvania, and New Jersey, et cetera, we might be able to move forward in more widespread deployment and implementation of 711.

711 TRS access is a very important step towards functional equivalency with voice services. Yes, we have had toll-free numbers like the 1-800 types, but none of those numbers offer the convenience a 711 number. I think it ought to bring TRS users on a par with the users of voice services and the rest of society. It is important for us to

move forward as quickly as we can on 711.

Yes, there are a number of issues here in the forum today. There are issues of cost recovery, for example. There are issues concerning outreach and education. There are issues concerning technical considerations such as whether we ought to use the Advanced Intelligent Network or should translations be performed on a switch-by-switch-by-switch basis.

There are numerous other issues dealing with implementation and deployment, but, in my view, there is one issue that rises above all others. That is the issue of widespread, nationwide deployment of 711 in as expeditious a manner as possible.

It was two and a half years ago, as I pointed out earlier, that the Commission reserved 711 for this purpose, yet really looking back, there are only a handful of states and a small number of companies that have actually employed 711. Even as the Commission indicated in the February '97 report and order, it is hoped that 711 could be deployed on a large-scale, widespread, nationwide basis perhaps in three years.

I think we could have done more. I think we should have done more. I would have to compliment some of the local exchange carriers that have taken the initiative in moving forward in the deployment of 711. I really don't

want to single any carrier.

I think it has been a cooperate effort, but really and truly, I think Bell Atlantic has taken more of an initiative in moving these issues forward, in addition the deployment of 711 in Hawaii perhaps under the auspices of GTE. So I compliment the industry on moving forward, and I hope that they can do it even more expeditiously down the road.

Once again, I'm glad that you have joined us, and we look forward to learning a great deal today from the distinguished panelists who have taken the time to come and share their thoughts with us. Thanks very much.

MS. NANKIN: I would like to start by explaining the format for the rest of the forum. There will be two sessions which will last about an hour each. We will have a short, 15-minute break between both sessions.

The first session will concentrate on three topics. The first one is the projected cost of implementing an Advanced Intelligent Network, or AIN-based, 711 system to access TRS and how those costs should be recovered. The second topic will be the procedures to ensure that TRS centers provide a choice of carriers to TRS users that will carry the TRS traffic from the TRS center to the called party. The third issue will be the implementation of 711 access to TRS on commercial mobile radio services networks.

For each topic a panelist will make a five-to-ten-minute presentation. After all the panelists have made their presentation in the first session, other panelists will have an opportunity to add their own points of view or ask questions. Questions may then be asked by the Commission staff on the panel and then by members of the public in the audience. We will address each issue in turn.

Because we have such an interesting topic, we have a lot of ground to cover. We have to keep panelists to the ten-minute limit.

In the second session we will follow the same format. We will address the remaining four topics. First, panelists will make their five-to-ten-minute presentations, then panelists, followed by Commission staff and members of the public, may comment and ask questions on each topic in turn. I will ask each panelist at the start of their presentation and anyone commenting or asking a question to first introduce themselves by stating their name, title, and affiliation, and give a little background on your company or organization. Finally, I would like to thank all of you for attending the forum and strongly encourage public participation.

And before we start the forum, Pam would like to say a few words.

MS. GREGORY: Thanks, Helene. In addition to

everyone's comments, of course, the DIT director, Meryl Icove, is not here. She is on vacation, but I know that she passes her thanks and her greetings to everyone here. And I wanted to recognize a very important group of people who are not in this room, and maybe people here don't know about this, but this is something that we're very, very proud of at the FCC, is that we have a lot of people with us today via the Internet.

And it's very exciting because people can go to our special 711 page, and they can listen via audio file or real-time captioning, and we have a special way that people can send in e-mails throughout the whole forum and join us, no matter where they are in the world. So I wanted to extend a special welcome to anyone who is participating via the Internet.

MS. NANKIN: Thank you. The first topic will be the cost of providing 711 access to TRS, and Rich Ellis will make that presentation.

MR. ELLIS: My name is Rich Ellis, and I'm from Bell Atlantic. I'm the director of strategic alliances for Bell Atlantic, and in that capability I've served as a liaison to national disability organizations and worked with these organizations on many policy issues.

I'm very pleased to be here. Thank you for inviting us, and I'm going to try to set a good example for

my counterparts by keeping my remarks very brief, and I'll try to talk very, very slowly for the benefit of the interpret irs as well, and hopefully we can cover all the ground today we need to cover.

711 access to relay services first became an issue on our corporate radar screen in about 1995, when Bell Atlantic of New Jersey received a request from the State of New Jersey to implement 711. At that time we reviewed the technological issues involved and determined that using our Advanced Intelligent Network was the way to go. Now, for those of you who are not familiar with telephone technology, this is simply an additional layer of intelligent which rides on top of the network and allows us to make changes to network services very economically and very efficiently.

At the time, there were lots of uncertainties related to 711 access. For example, the number, 711, had not yet been reserved by the FCC. So while we knew we could physically do a 711 implementation, because of the uncertainties we decided that it was not an appropriate time to do that.

Two years later, the FCC did reserve 711 as the official numbers for relay access, and at that time we received requests from the State of Maryland to implement 711 access to relay centers. So we reassessed the technological issues involved and decided that it was time

to move ahead on this project.

In terms of costing, we determined the cost to be is where less than $100,000 per state. It's kind of hard to put an exact number on it because the platform an already in existence, and it's just trying to figure out what the incremental costs are for 711.

But when we did that we also made the policy decision that Bell Atlantic would absorb the costs. It would be passed on to the states or to their relay providers or the relay users. 711 was implemented in Maryland in February of this year, and Gil will talk later on about the successes there. I had the pleasure in July of that year to speak at the National Association of the Deaf Conference and was able to announce that Bell Atlantic was committing to implement 711 throughout our region, which at the time extended from Maine to Virginia.

We have continued work on that process. As I mentioned, Maryland is implemented today. As of today, the southern states of Bell Atlantic, and someone once said, only in Bell Atlantic could New Jersey be considered a southern state, but the states from New Jersey down are pretty much ready to go from our side of the call. We could transfer the call from the caller to the relay center. But this project requires cooperation from a number of players, so although we are ready with our piece, other people are

still working on their pieces.

In the north part of the Bell Atlantic region, New York and New England, we are still doing some final testing on the AIM platform, but we expect to have that part of our region ready to go with 711 implementation at the end of the year, early next year. And I think I'll just wrap up right there.

MS. NANKIN: Thank you. The second topic will be procedures for ensuring that TRS centers provide a choice of carriers to TRS users that will carry their TRS traffic from the TRS center to the called party. We have three speakers on this topic -- Karen Strauss, William McClelland, and Claude Stout. Karen Strauss will be the first speaker. Karen?

MS. STRAUSS: I'm here today in two capacities. I'm representing both the National Association of the Deaf and the Council of Organizational Representatives on National Issues Concerning People Who Are Deaf and Hard of Hearing. The latter uses an acronym, CORE, and it is a coalition of various deaf and hard-of-hearing service organizations and membership organizations that advocate for the rights and interests of people who are deaf and hard of hearing.

Carrier of choice has come to have two distinct meanings with respect to TRS. Initially, this term referred

to the right of a rely customer to be able to choose access to his or her interexchange carrier. The FCC's rules on TRS established this right and state, I quote, that "TRS users shall have access to their chosen interchange carrier through the TRS to the same extent that such access is provided to voice users."

While this remains the law of the land, in practice exercising this right has become a burdensome task. That is because in practice many TRS users route TRS calls through their own long-distance services. This is a problem for two types of consumers.

First, there are many consumers that aren't even aware that they must specify their long-distance carrier with their relay provider. Although many of these consumers have already chosen long-distance carriers with their local-service carriers, they may not be getting their carriers of choice if all of their incoming relay calls in their state are routinely routed to the interchange company that happens to be the relay provider for the state.

Second, a number of consumers report that they haven't been able to exercise their right to choose their own long-distance carrier. One consumer has reported that he had to go through considerable effort to change his carrier to one that he had chosen to begin with. Another has reported that his relay service refused him the right to

choose his individual carrier on an individual-call basis.

What does this have to do with 711? One of the important things in implementing 711 is to make sure that when it is implemented that consumers have the right to choose from their own interchange carriers. Among other things, this will mean that where a consumer chooses a carrier the TRS provider must be responsible for including the name of that carrier in the customer's user profile.

When using 711 the customer should be secure in the knowledge that the communications assistant receiving the call will have ready access to information about the consumer's carrier of choice in the consumer's profile. Similarly, if the consumer wishes to change the carrier on a call-by-call basis, the technology should be in place to allow this choice to the same extent that voice users have this capability.

There is a second meaning of carrier of choice with respect to relay services. It also refers to the right to choose a TRS or relay provider that actually performs the relay of the call. Presently, consumers have the ability to make such a choice of TRS providers in California and for intrastate calls, and it's only a matter of time before this capability is spread throughout the entire country.

Both consumers and industry are eager to see increased competition among relay providers. Increased

competition can open the door to new product and services innovation and improved relay quality. Relay competition, which is also called "multivendoring," follows the competitive trends of the Telecommunications Act of 1996.

It promises to offer consumers choice in the relay features that best suit them. It discourages monopolistic arrangements, and it encourages telecommunications providers to consistently improve their services. This will also become increasingly important as the types of relay services continue to proliferate, including speech-to-speech relay services, video relay services. It's only a matter of time before certain relay providers develop specialties in one or another various, very distinct relay services.

Implementation of the 7-1-1 code should be completed in a manner that maintains and fosters relay competition. For example, 711 can be used much in the same way that callers now use Dial 1 service for their long-distance carriers. Application of this type of service would allow a customer to prescribe to a relay vendor from a home or business, and hopefully the prescription would not automatically tie an individual to only one's chosen long-distance carrier.

The customer may prefer the particular features of a long-distance carrier to carry the call but a different relay provider to relay the call. In addition, customers

should have the option of dialing a different number or an additional access code to reach a particular provider if they are not at home, much in the same way that the public now has the ability to dial around to one's long-distance carrier of one's choice through a 10-XXX code or a similar telephone-access code, such as a calling card.

Enabling customers to prescribe to their referred relay provider while enabling these customers to continue accessing a different provider when away from their preselected phone will achieve a number of objectives. First, relay providers will be able to compete for individual consumer subscriptions.

Second, relay providers will continue to compete for state and regional contracts so that they can serve as a default TRS vendor for those regions. And then, of course, travelers when traveling would be able to simply dial 711 and be assured access to TRS anywhere in the U.S.

And finally, relay providers would compete for business from consumers who are away from that preselected phone, as these customers hopefully would be able to dial either one of the currently existing national 800 numbers or an alternative relay code to access a particular local vendor.

Alternatively, 711 could provide a gateway through which customers could obtain access to multiple relay

vendors on a call-by-call basis. This gateway could even be used to access other disability services, such as TTY operator services and perhaps video-relay services. A gateway can also offer one means of allowing a consumer to bypass a preselected provider for certain calls.

Let me just state, that's my presentation on carrier of choice, and I just also wanted to say, which I should have said at the beginning, I would like to thank the FCC for holding this forum and greatly appreciate the FCC's interest in seeing 711 expedited as a national access code throughout the United States. Thank you.

MS. NANKIN: Thank you. Before going on to the next disappear, I would like to recognize and introduce Tom Power, who is a senior legal adviser in the Office of the Chairman.

MR. POWER: Thanks. Well, thank you, and the chairman asked me to come down and say a few words on his behalf. Unfortunately, he couldn't make it today due to some conflicts, but Pam sent him an e-mail last week reminding him about this and reminding him of his conflict, we both got a terse reply, which was brief me on this as soon as possible. So he is taking in what's going on here, and I'm really glad that we were able to put this on.

I also want to say a welcome to the folks who are participating via the Internet and invite them to talk back

to us via the e-mail capability that I understand they have and let us know anything they've to add with respect to this proceeding and all our issues regarding disabilities.

These disabilities issues are really, really important to the chairman. I can give you any number of examples of how I see that. One is he goes and speaks to forums like this and conventions, whether regarding disabilities or other issues, but when he accommodation back after talking to the disabilities groups and forums I can't tell you how pumped up he is, because it is so easy to see how much progress we can make in these areas.

We talk a lot about the modern telecommunications networks and services and everything that's available, but it's only valuable to the to the extent that people can use it and only to the extent that everybody can use it. We have a long history in this country of universal service as a means of getting services to people in remote areas and in areas where it costs a lot to serve and to people of low income, but, of course, that's great for those folks, but there are lots of other Americans who need assistance and service in other ways, and this really is at the heart of a lot of what the chairman is focused on.

In July we adopted rules pursuant Section 255 of the Act, and I can tell you that was, I believe, his proudest moment since he has been here. He is really

enthusiastic about these issues, and I know he is really glad that you all are meeting here today, and thanks to folks like Pam Gregory from our disabilities task force. I'm glad to see Jamal here.

We've got a great crew here, and not to pat ourselves on the back too much, but I do want you to know, and I want them to know how much the chairman appreciates their help. And particularly on the issue of 711 for TRS services, it just makes as much sense.

Pam was sharing with me some of the numbers from the experience in Maryland with 711 and how prior to 171 about 75 percent of the TRS calls were made by people are hearing disabilities. After 711 folks without the hearing disabilities are making much more of the calls, much more than they used to make. And, of course, the reason is obvious. If you've got the disability, and it's your only way to make a call, you're going to do it.

For folks who don't have disabilities, maybe they don't make the call, but once you use 711 then it makes the call that much easier to make, you're going to see those calls being made, and that, of course, is a huge improvement.

And I did want to recognize the folks from Maryland at the Office of Telecommunications Access because I know that they have really been on the forefront of this

and looking into the availability of choice among long-distance carriers over TRS, which, of course, is another big issue that we need to be focusing on, as we just heard.

So I didn't want to take up too much time here, but I did want to express to you the chairman's strong commitment to making sure that the development of new services and new technology and the introduction of competition, which as the previous disappear was just saying, is at the heart of what we're doing in all the respects, those benefits have to come to folks with disabilities, too. So thank you for being here, and I appreciate you taking a little pause here to let me send you the remarks from the Chairman. Thanks.

MS. NANKIN: Thank you very much, Tom. We will pick up with the second topic, carrier of choice, and the next disappear will be William McClelland.

MR. McCLELLAND: Thank you. My name is William McClelland, and I'm the senior manager of technical aspects at MCI WorldCom's global relay platform, basically just an engineering kind of guy.

MCI supports 711. We are currently working with Vista IT, Bell Atlantic, and State of Massachusetts, for implementation in the State of Massachusetts. It's going to reduce confusion in traveling. It's going to facilitate